

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

INTERNATIONAL BROTHERHOOD OF
ELECTRICAL WORKERS LOCAL 98
PENSION FUND on behalf of itself and all
others similarly situated,

Plaintiff,

vs.

DELOITTE & TOUCHE, LLP;
DELOITTE LLP,

Defendants.

Case No. 3:19-cv-3304

**SECOND AMENDED CONSENT
SCHEDULING ORDER**

Pursuant to the joint request of Lead Plaintiff International Brotherhood of Electrical Workers Local 98 Pension Fund (“Lead Plaintiff”) and Defendants Deloitte & Touche, LLP, and Deloitte LLP (collectively, “Defendants,” and together with Lead Plaintiff, the “Parties”), the following second amended scheduling order is established for this case.

1. Defendants shall file their opposition to Lead Plaintiff’s motion for class certification on or before **October 1, 2021**. Lead Plaintiff’s class certification reply shall be filed on or before **October 29, 2021**.
2. Motions to join other parties or amend the pleadings shall be filed no later than **December 3, 2021**.
3. Fact discovery shall be completed no later than **May 20, 2022**. All discovery requests shall be served in time for the responses thereto to be served by this date. The Parties agree to make good-faith efforts to produce readily available documents on a rolling basis and to substantially complete document discovery on or before **November 15, 2021**.
4. Mediation, pursuant to Local Civil Rules 16.03 - 16.11, shall be completed in this case on or before **June 30, 2022**. At least thirty (30) days prior to this mediation deadline, counsel for each party shall file and serve a statement certifying that counsel has: (1) provided the party with a copy of the Mediation Order; (2) discussed the availability of mediation with the party; and (3) discussed the advisability and timing of mediation with opposing counsel.
5. Lead Plaintiff shall file and serve a document identifying by full name, address, and telephone number each person whom Lead Plaintiff expects to call as an expert at trial, and the topics on which that expert is expected to testify, by **June 16, 2022**.

6. Defendants shall file and serve a document identifying by full name, address, and telephone number each person whom Defendants expect to call as an expert at trial, and the topics on which that expert is expected to testify, by **July 1, 2022**.
7. Any Party filing an affirmative expert report shall file and serve a document certifying that a written report prepared and signed by any expert, including all information required by Federal Rule Civil Procedure 26(a)(2)(B) unless otherwise agreed to by the parties, has been served on the other party by **July 29, 2022**.
8. Rebuttal expert reports shall be served on the other parties by no later than **September 14, 2022**.
9. Expert discovery, including expert depositions, shall be completed by no later than **October 14, 2022**. Each expert shall be deposed only once even if that expert submits both an affirmative and rebuttal report.
10. The Parties shall serve affidavits of records custodians that a party intends to offer for authentication in lieu of live testimony consistent with the timing in Local Civil Rule 16.02(D)(3).
11. Any party that seeks summary judgment shall file its motion and supporting papers on **November 18, 2022**. Opposition papers shall be filed by **January 13, 2023**. Reply papers shall be filed by **February 10, 2023**.
12. Following the completion of briefing on any summary judgment motions, the Court shall hold a pretrial conference pursuant to Federal Rule of Civil Procedure 16(a), at which the schedule for jury selection and pretrial motions (including motions *in limine*) and other trial-related matters can be set.

IT IS SO ORDERED.

/s/ Margaret B. Seymour
Senior United States District Judge

Columbia, South Carolina

August 4, 2021